

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER, Plaintiff	)	
	)	
	)	
v.	)	
	)	Civil Action No. 04-11935-DPW
ANDREA CABRAL, SUFFOLK	)	
COUNTY SHERIFF'S DEPARTMENT,	)	
SUFFOLK COUNTY, and	)	
CORRECTIONAL MEDICAL	)	
SERVICES, INC.	)	
Defendants	)	
	)	

**MOTION TO QUASH**

Now come the Defendants Andrea Cabral, Suffolk County Sheriff's Department, and Suffolk County and respectfully request that this Honorable Court quash two depositions noticed by the Plaintiff and scheduled for April 28 & 29, 2005. As reasons therefore the Defendants state that they have filed a Motion to Stay, under seal, on April 21, 2005. The Court has yet to rule on the Defendants Motion to Stay.

**Defendants Request A Hearing On Their Motion.**

Respectfully submitted  
Andrea Cabral, Suffolk County Sheriff's  
Department, and Suffolk County  
By their attorney,

/s/ Ellen M. Caulo  
Ellen M. Caulo  
BBO #545250  
Deputy General Counsel  
Suffolk County Sheriff's Department  
200 Nashua Street  
Boston, MA 02114  
(617) 989-6681

Date: April 21, 2005

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

Counsel for the Defendant hereby certifies pursuant to Local Rule 7.1 that she has conferred with counsel for the Plaintiff and Co-Defendant CMS in an effort to resolve the issues raised by the instant motion.

/s/Ellen M. Caulo  
Ellen M. Caulo